

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re

PATRIOT NATIONAL, INC., *et al.*,  
Debtors.

Ch. 11 Case No. 18-10189 (KG)

HONORABLE TRINIDAD NAVARRO,  
INSURANCE COMMISSIONER OF THE  
STATE OF DELAWARE, in his capacity as  
RECEIVER OF ULLICO CASUALTY  
COMPANY IN LIQUIDATION,

Civil Action No. 18-00751 (RGA)

Appellant,

v.

PATRIOT NATIONAL, INC., CERBERUS  
BUSINESS FINANCE, LLC, and FLORIDA  
DEPT. OF FINANCIAL SERVICES,

Appellees.

**STIPULATION AND [PROPOSED] ORDER  
REMOVING APPELLEE FROM CASE CAPTION**

The Florida Department of Financial Services, Division of Rehabilitation and Liquidation, in its capacity as Receiver of Guarantee Insurance Company (the “GIC Receiver”), the Honorable Trinidad Navarro, Insurance Commissioner of the State of Delaware, in his capacity as Receiver of Ullico Casualty Company in Liquidation (“Appellant”), and appellees Patriot National, Inc. and Cerberus Business Finance, LLC (together, the “Appellees” and, collectively with the GIC Receiver and Appellant, the “Parties”) hereby stipulate and agree to the following:

**WHEREAS**, on May 17, 2018, the Appellant filed a Notice of Appeal [D.I. 1] commencing this action;

**WHEREAS**, the GIC Receiver was improperly listed on the docket and pleadings as an Appellee in this action;

**WHEREAS**, the GIC Receiver would like to correct the docket and case caption to reflect that it is not a party in this action;

**NOW, THEREFORE**, IT IS HEREBY STIPULATED AND AGREED, SUBJECT TO COURT APPROVAL, THAT:

1. The GIC Receiver is not a party to this action.
2. Court approval of this Stipulation will constitute a direction for the Clerk of the Court to remove the GIC Receiver as a party in this action.
3. The Parties will not list the GIC Receiver in the case caption in future filings in this case.

Dated: May 11, 2020

BAYARD, P.A.

/s/ GianClaudio Finizio

Neil B. Glassman (No. 2087)  
GianClaudio Finizio (No. 4253)  
600 N. King Street, Suite 400  
Wilmington, Delaware 19801  
Telephone: (302) 655-5000  
Facsimile: (302) 658-6395  
Email: [nglassman@bayardlaw.com](mailto:nglassman@bayardlaw.com)  
[gfinizio@bayardlaw.com](mailto:gfinizio@bayardlaw.com)

*Attorneys for The Honorable Trinidad Navarro,  
Insurance Commissioner of the State of  
Delaware, as Receiver of Ullico Casualty  
Company in Liquidation*

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Laura Davis Jones (No. 2436)  
James E. O'Neill (No. 4042)  
Peter J. Keane (No. 5503)  
919 North Market Street, 17th Floor

THE ROSNER LAW GROUP LLC

/s/ Scott J. Leonhardt

Scott J. Leonhardt (No. 4885)  
824 N. Market Street, Suite 810  
Wilmington, Delaware 19801  
Telephone: (302) 777-1111  
Email: [leonhardt@teamrosner.com](mailto:leonhardt@teamrosner.com)

*Attorneys for the Florida Department of  
Financial Services, Division of Rehabilitation  
and Liquidation, as Receiver of Guarantee  
Insurance Company*

LANDIS RATH & COBB LLP

/s/ Adam G. Landis

Adam G. Landis (No. 3407)  
Kerri K. Mumford (No. 4186)  
919 North Market Street, Suite 1800  
Wilmington, Delaware 19801

Wilmington, Delaware 19801  
Telephone: (302) 652-4100  
Facsimile: (302) 652-4400  
E-mail: ljones@pszjlaw.com  
joneill@pszjlaw.com  
pkeane@pszjlaw.com

*Attorneys for Patriot National, Inc.*

Telephone: (302) 467-4400  
Facsimile: (302) 467-4450  
E-mail: landis@lrclaw.com  
mumford@lrclaw.com

*Attorneys for Cerberus Business Finance, LLC*

IT IS SO ORDERED this 12 day of May, 2020

/s/ Richard G. Andrews  
U.S. District Judge Richard G. Andrews